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Before the
Federal Communications Commission
Washington, D.C. 20554

MAY - 5 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's Rules to)
Establish Rules and Policies Pertaining)
to a Mobile Satellite Service in the) CC Docket No. 92 - 166
1610 - 1626.5/2483.5 - 2500 MHz)
Frequency Bands)

COMMENTS OF THE MANAGER OF THE
NATIONAL COMMUNICATIONS SYSTEM

The Secretary of Defense, Executive Agent of the National Communications System (NCS)¹, through duly authorized counsel, pursuant to Section 201 of the Federal Property and Administrative Services Act of 1949, 40 U.S.C. 481, and the Memorandum of Understanding between the Department of Defense and the General Services Administration dated

¹Executive Order No. 12472, "Assignment of National Security and Emergency Preparedness Telecommunications Functions," April 3, 1984 (49 Fed. Reg. 13471, 1984), established the National Communications System (NCS), which consists of an administrative structure involving the Executive Agent, Committee of Principals, Manager, and the telecommunications assets of the Federal organizations which are represented on the Committee of Principals. Section 1(e) of Executive Order 12472 designates the Secretary of Defense as Executive Agent for the NCS. By direction of the Executive Office of the President (EOP), the NCS member organizations (which are represented on the Committee of Principals) are: Department of Agriculture, Central Intelligence Agency, Department of Commerce, Department of Defense, Department of Energy, Federal Emergency Management Agency, General Services Administration, Department of Justice, National Aeronautics and Space Administration, the Joint Staff, Department of State, Department of Transportation, Department of Treasury, U.S. Information Agency, the Department of Veterans Affairs, Department of Health and Human Services, Department of the Interior, National Security Agency, the National Telecommunications and Information Administration and the Nuclear Regulatory Commission. The Federal Communications Commission, the United States Postal Service and the Federal Reserve Board also participate in the activities of the NCS. The vast majority of the telecommunications assets of these 23 organizations are leased from commercial communications carriers and serve the NS/EP needs of the Federal government as well as state and local governments.

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November 27, 1950, hereby files these comments on behalf of the Manager, NCS in the above-captioned rulemaking proceeding.

The mobile satellite services that are the subject of this proceeding are services that could be effectively utilized by the National Security and Emergency Preparedness (NS/EP) telecommunications planner in fulfilling critical NS/EP functions. While the Commission has made statements in the Notice of Proposed Rulemaking (NOPRM) that are encouraging to the NS/EP planner², the Manager believes a specific discussion or reference in the rule-adopting Report and Order that the new mobile satellite licensees must cooperate in the provision of NS/EP services is necessary.

In paragraph 25 of the NOPRM, the Commission asks whether technical requirements other than those proposed might be necessary. In paragraph 86, the NOPRM speaks of the necessity of coordination with search and rescue organizations should the licensee offer emergency or safety communications. It is the Manager's position that any discussion of technical requirements should include references to survivable and endurable communications and, additionally, participation in the provision of NS/EP communications. As far as coordination, the Manager would certainly welcome the participation of these new licensees in the activities of the National Coordinating Center for Telecommunications, the joint industry/government emergency coordinating center located at the NCS.

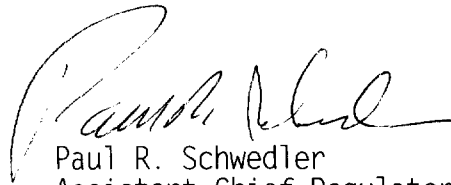
²See, for example, paragraph 3: "...Domestically, this service will help meet the demand for a seamless, nationwide communications system that is available to all and that can offer a wide range of voice and data telecommunications services", and paragraph 24: "...We therefore propose to require each applicant to demonstrate that its proposed system is capable of providing continuous voice services to users throughout the fifty states."

The Manager does not propose any particular language to be included in the Commission's rules to address NS/EP concerns. Telecommunications providers have in the past responded well to meet the NS/EP requirements of Federal, state and local governments. It is requested however that in adopting rules for this service, that the Commission confirm that all of the new licensees should give consideration to NS/EP requirements and cooperate in meeting them.

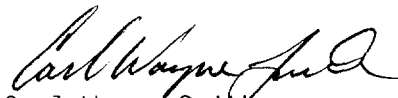
CONCLUSION

The Manager urges the Commission to confirm that licensees in the new mobile satellite service to be authorized as a result of this rulemaking should, as licensees in other services, consider NS/EP requirements and cooperate in meeting those requirements.

Respectfully submitted,



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